

Exhibit “A”

1 Q. Who is your cell phone provider?

2 A. T-Mobile.

3 Q. How long have you had that cell phone number?

4 A. I don't recall the amount of years, but it's
5 been a long time. Always had this number.

6 Q. Fair enough. And has T-Mobile been your
7 provider continuously?

8 A. It was Sprint. It's now T-Mobile.

9 Q. When Sprint and T-Mobile sort of merged
10 together, you became a T-Mobile customer?

11 A. Yes.

12 Q. All right. Do you have any social media
13 accounts currently?

14 A. Yes.

15 Q. Okay. Tell me about those.

16 A. Facebook, Instagram, TikTok.

17 MR. WEEKS: All right. Facebook, I think
18 there is some Facebook information in this case.
19 And I believe I found you on Facebook. I'll go
20 ahead and mark this as 1.

21 (Plaintiff's Exhibit 1 was marked.)

22 BY MR. WEEKS:

23 Q. This something that I found that has a guy
24 with some drums and it's Wendelldrum --
25 facebook.com\wendelldrum. Is that your Facebook?

1 month -- that year. So that was the last time I saw her
2 and I believe the last week we actually talked.

3 Q. Okay. Fair enough. So the holiday season of
4 2023 was the end of your relationship; fair enough?

5 A. Yes.

6 Q. So we're just talking about a period from --
7 pretty short period from September of '23 to --

8 A. Yeah.

9 Q. -- the holiday season of 2023; correct?

10 A. Yes, very short.

11 Q. Were you and Natalie ever intimate?

12 A. Yes.

13 Q. How many times?

14 A. I don't recall exactly how many times. But if
15 I had to guess, maybe three.

16 Q. Okay. When you would hang out with Natalie,
17 was it always at her place?

18 A. It was always at her place with the exception
19 of one time we went to Marietta Seafood Market, if I
20 recall correctly.

21 Q. So like a dinner date?

22 A. Yes.

23 Q. Y'all went for dinner. And then from that
24 point, did you go back to her place, or did you go home
25 and she went back to her place?

1 Q. Did you ever use WhatsApp with Ms. Soto?

2 A. I don't recall.

3 Q. How about Snapchat? Did you ever Snapchat
4 with Natalie?

5 A. I don't have a SnapChat. I'm not on SnapChap.

6 Q. As far as you know, the only electronic
7 communication you would have had with Ms. Soto was on
8 Bumble initially and then via text message once you
9 exchanged numbers?

10 A. Yes.

11 Q. And did you talk on the phone in addition to
12 texting?

13 A. At any time or --

14 Q. Yeah.

15 A. We very rarely talked on the phone. Most of
16 our conversations were in person when I did see her or
17 through text messages. I'm -- me and my wife lived
18 together. So I couldn't be talking to her on the phone.

19 Q. Did your wife know that you were talking to
20 Natalie?

21 A. No. I didn't discuss that with her.

22 Q. I guess she knows now?

23 A. Oh, she definitely knows now.

24 Q. All right. You said Natalie sent you some
25 photos at some point. Can you give me an idea of how

1 **many?**

2 A. Probably, if I had to guess, three off the top
3 of my head that I can remember. It could have been
4 more. I just know of three particular ones.

5 **Q. All right. Did you ever send any photos of**
6 **yourself to Natalie?**

7 A. I don't recall ever sending any photo to her.

8 **Q. And those photos of Natalie, I've seen at**
9 **least two of them that show her exposed breasts. Would**
10 **you agree with that?**

11 A. You said you've seen two?

12 **Q. Yes.**

13 A. Yes. She did send me a couple of photos that
14 exposed her breasts.

15 **Q. You had at least two photos of Natalie of her**
16 **exposed breasts?**

17 A. Yes.

18 **Q. And that showed her nipple and aureola?**

19 A. I believe one did, yes. The other one, I
20 believe, her hair was covering up.

21 **Q. Got you. So Natalie has told me that at some**
22 **point she was suspicious because she had never been to**
23 **your house, instead you were always going to her house.**

24 A. Correct.

25 **Q. So she said she then looked you up online and**

1 **sister-in-laws were going to confront you about that;**
2 **correct?**

3 A. I never saw that part. I don't know if that's
4 true or not.

5 **Q. Okay. All right.**

6 A. I mean, these are messages between them. I'm
7 only getting what my wife gets.

8 **Q. All right. Have you ever had any other phone**
9 **number other than -- in the last five years other than**
10 **the one you gave me --**

11 A. Yes.

12 **Q. -- earlier? What other --**

13 A. Yes.

14 **Q. What other phone numbers have you had in the**
15 **last five years other than the one you gave me earlier?**

16 A. I have a Google number.

17 **Q. And what is that?**

18 A. The number?

19 **Q. Yes, sir.**

20 A. I would have to look at my phone. I don't
21 know it by heart.

22 **Q. Can you do that?**

23 A. Sure. It's on one of these papers, I know for
24 sure. (201) 540-9457.

25 **Q. And that is your Google voice number?**

1 A. Yes, sir.

2 Q. And you use that for business?

3 A. I use it for different things.

4 (Plaintiff's Exhibit 4 was marked.)

5 BY MR. WEEKS:

6 Q. All right. This is a text thread that Natalie
7 provided to me that she received on February 22nd, 2024.
8 And at the top of this thread it has (201) 540-9457.
9 You see that?

10 A. Yes, sir.

11 Q. And you just told me that was your Google
12 number?

13 A. It is.

14 Q. And the first text comes in at 1:24 p.m. on
15 February 24th, 2024; correct?

16 A. Yes. That's what it says.

17 Q. And that is essentially a screenshot of what
18 we just marked as Plaintiff's 3; correct?

19 A. Yeah.

20 Q. And so on this day, February 22nd, 2024, you
21 sent that screenshot to Natalie?

22 A. Yes. I believe so.

23 Q. And then Natalie says, Who is this? I guess
24 you have two phone lines. That's nice to know. You
25 messed with the wrong person. Karma works in mysterious

1 Q. That's what Natalie said to you?

2 A. Yes, sir.

3 Q. And then Natalie said, And your wife deserves
4 so much better than what you do to her so you're just
5 mad because you got caught.

6 That's what Natalie said to you; correct?

7 A. What Natalie said to me.

8 Q. And then she says, For someone who votes
9 themselves -- I think she might have meant "devotes",
10 but somebody who votes themselves to the Lord, you sure
11 are manipulator you're a user and you think you're like
12 the best thing ever when the man upstairs, the one you
13 have to answer to not to me not anybody else with the
14 man upstairs when it's your time, so I don't know how
15 you can go and sit in church being the way that you are.

16 See that?

17 A. Yes, sir.

18 Q. That's what Natalie said that to you; correct?

19 A. Yes.

20 Q. And in response you said, Don't forget to lock
21 your doors, poo emoji; correct? You said that to
22 Natalie; correct?

23 A. Yes, sir.

24 Q. And then you said, Not mad at all, I get even.
25 I can play better.

1 That's what you said to Natalie; right?

2 A. That's what I said to Natalie.

3 Q. And then Natalie said, Don't you have the
4 first find me first and I haven't even been staying at
5 my new house, so good luck on that one. And your
6 threats don't even scare me, so good luck on that one
7 you're just mad and being petty.

8 That's what Natalie said; correct?

9 A. Correct.

10 Q. And the next thing that you said is, You are a
11 dumb bit bitch. You knew I was married. You look
12 stupid but you knew you were slow and stupid. My wife
13 can't believe I would even talk to someone as ugly as
14 you, lol, and she's right. You really a trailer park
15 trash hoe. You and your daughter.

16 You said that; correct?

17 A. I did.

18 Q. Oh trust I can find you, lol.

19 You said that; correct?

20 A. L-o-l.

21 Q. That's "laugh out loud"; correct?

22 A. Yes.

23 Q. You said that? You're telling Natalie you
24 could find her; correct?

25 A. Yes.

1 A. No.

2 Q. What's your explanation for this then?

3 A. We got time to go through the explanation? I
4 mean, she's typing all this so -- I got a long
5 explanation.

6 Q. Okay. That was my -- answer my question.

7 What is your explanation for your name being --

8 A. My explanation is anybody could have created
9 this and sent this. That's my explanation. I didn't
10 send this.

11 Q. Okay.

12 A. And also my explanation for my social media is
13 multiple people, including Natalie, has access to my
14 social media because she knows my login. Me and Natalie
15 got very close, very personal. She knows my login. My
16 wife knows my login. My sister-in-law knows my login.
17 And there is no telling who else, because the only thing
18 I post on social media is basically about music. So I
19 have nothing to hide on social media or keep secret. My
20 pages are open.

21 Q. Well, you admitted the day before you told
22 Natalie maybe I'll post some of your nude photos on that
23 same chat, then we'll see how you look to all these
24 women; correct?

25 A. I did make that statement. This is not the

1 same chat. This looks like a personal message. This is
2 not a chat.

3 **Q. I understand. In the chat with Natalie you**
4 **threatened her the day before to post her nudes;**
5 **correct?**

6 A. I made a lot of statements in the heated
7 exchange. We both made threats towards each other. I
8 would never act on those threats. I was angry at the
9 time.

10 **Q. So you admit that you threatened to post**
11 **Natalie's nudes on the same chat; correct?**

12 A. On the same chat Are We Dating The Same Man.
13 But here's the key. Men can't get on that site. So
14 only a female could post it on there.

15 **Q. This says Wendell Holmes, Jr., at the top,**
16 **though; correct?**

17 A. We're talking the chat right now, the group
18 chat, we're talking about. In the message that you're
19 referring to with Natalie, we've talked me posting on
20 the group chat Are We Dating The Same Man. I can't
21 get -- no man can get access to that chat.

22 **Q. But you threatened to post her nudes on that**
23 **chat?**

24 A. I did. But I can't get in it. So it was
25 basically a lie threat to get her to take the post down.

1 Q. Okay. And you told her she had until noon on
2 February 23rd to delete everything before you made her
3 life a living hell and you exposed her. We already
4 talked about that; right?

5 A. We did. Again, it was in that same heated
6 argument. No intent to act on it.

7 Q. So if Ms. Dawn said she received this from
8 you, she's lying?

9 A. I don't know if she -- I don't -- she didn't
10 receive it from me personally. So yes, she would be
11 lying.

12 Q. She received it from your Facebook account?

13 A. Yes. She's lying.

14 Q. Dawn is lying about receiving this
15 message that we're looking at here --

16 A. From me.

17 Q. Let me --

18 THE COURT REPORTER: One at a time, please.

19 Q (By Mr. Weeks) Dawn is lying about receiving
20 what we've marked as Plaintiff's 5 from your Facebook
21 account?

22 A. I don't have the answer to that. I didn't
23 send it. That's the answer.

24 Q. Who sent it then?

25 A. I have no idea.